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Attorneys for Plaintiffs

X.D. & X. C. THROUGH GAL TRACIE HALL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

X.D. BY AND THROUGH
GUARDIAN AD LITEM TRACI
HALL, INDIVIDUALLY AND AS
SUCCESSOR IN INTEREST TO
NIANA FINLAYSON, DECEASED,
individually; S.C. BY AND
THROUGH GUARDIAN AD LITEM
KENNETH COTTON
INDIVIDUALLY AND AS
SUCCESSOR IN INTEREST TO
NIANI FINLAYSON, DECEASED,
individually,

Plaintiffs,

vs.

COUNTY OF LOS ANGELES;
DEPUTY TY SHELTON; and DOES
1-10, inclusive,

Defendants

Case No. 8:24-cv-00902-FWS-PVCx

Honorable Fred W. Slaughter

**DECLARATION OF HANG D. LE IN
SUPPORT OF PLAINTIFFS'
UNOPPOSED EX PARTE
APPLICATION FOR RELIEF
FROM ORDER RE STIPULATION
AND REQUEST FOR ORDER OF
DISMISSAL [DKT. NO. 64]
PURSUANT TO FED. R. CIV. P.
60(b)(6)**

1 I, Hang D. Le, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California,
3 and the Central District of California. I make this declaration in support of
4 Plaintiffs' Unopposed Ex Parte Application for Relief from Order re Stipulation and
5 Request for Order of Dismissal [Dkt. No. 64] Pursuant to Fed. R. Civ. P. 60(b)(6)
6 ("Ex Parte Application"). I have personal knowledge of the facts contained herein
7 and could testify competently thereto if called.

8 2. On July 30, 2025, I contacted Defendants County of Los Angeles' and
9 Ty Shelton's ("Defendants") counsel in compliance with Local Rule 7-19 through 7-
10 19.1. Defendants' counsel are:

11 Rickey Ivie, Esq.
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12 Marina Samson, Esq.
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13 Ivie McNeill Wyatt Purcell & Diggs
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16 Defendants have indicated that pursuant to the Stipulation and Request for Order of
17 Dismissal that they entered into with Plaintiffs (Dkt. No. 63), they do not oppose
18 Plaintiffs' Ex Parte Application.

19
20 I declare under penalty of perjury under the laws of the State of California and the
21 United States of America that the foregoing is true and correct. Executed this 30th
22 day of July 2025, in Woodland Hills, California.

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26 Hang D. Le
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